

Exhibit D

DIANA MARQUEZ, 01/20/95

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LOONEY & COMPANY

210/734-7127

FOR:

E. PAUL CAULEY, JR.

CONDENSED TRANSCRIPT AND CONCORDANCE

PREPARED BY: GENEVA GONZALES, CSR

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BSA

DIANA MARQUEZ, 01/20/95

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(24) Q. Did you and he ever discuss going through
(25) any type of marriage ceremony or becoming legally

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(1) married?
(2) **A. Yes.**
(3) Q. Had you decided against it?
(4) **A. I don't understand.**
(5) Q. Okay. Although you discussed becoming
(6) married, what kept y'all from doing it?
(7) MR. ALEXANDER: Let me object to
(8) the question again as to the use of the
(9) term "marriage," unless you want to specify
(10) ceremonial marriage.
(11) Q. (By Mr. Cauley) You can answer.
(12) MR. ALEXANDER: No, I'll instruct
(13) her not to answer in that form.
(14) Q. (By Mr. Cauley) Did you and your husband
(15) discuss having a legal marriage as you understand
(16) that term under Mexican law?
(17) MR. ALEXANDER: I need to take a
(18) break.
(19) (WHEREUPON, a brief recess
(20) was taken.)
(21) (WHEREUPON, Deposition
(22) Exhibit Nos. 6 through 11
(23) were marked for
(24) identification purposes.)
(25) Q. (By Mr. Cauley) Okay. Back on the record.

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(1) Do you know if Mr. Munoz had any other children other
(2) than Laura Patricia?
(3) **A. No.**
(4) Q. You don't know, or he did not?
(5) **A. No, he doesn't have any.**
(6) Q. Have you ever been ceremonially married to
(7) anyone?
(8) **A. No.**
(9) Q. Do you know if Mr. Munoz has ever been
(10) ceremonially married to anyone?
(11) **A. No.**
(12) Q. I apologize for my poor question. He has
(13) not been married, or you do not know if he has been
(14) married?
(15) **A. No, he's never been married.**
(16) Q. When did you decide to move to the United
(17) States following the death of Mr. Munoz?
(18) **A. I beg your pardon? When?**
(19) Q. When did you make the

decision that you
(20) would move to the United States?
(21) **A. Well, after he - after he died and I saw**
(22) **that I didn't have any resources for myself or for my**
(23) **daughter.**
(24) Q. Are you working in the United States?
(25) **A. No.**

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(1) Q. How would moving to the United States give
(2) you resources to support you and your daughter?
(3) **A. Well, for her because she's from here.**
(4) Q. Okay. Have - since coming to the
(5) United States, have you asked for any type of
(6) assistance or money or anything for your daughter
(7) from the United States or the State of Texas?
(8) **A. No.**
(9) Q. Before coming to the United States, did you
(10) know anyone who lived in San Diego, Texas?
(11) **A. No.**
(12) Q. Prior to making your decision to come to
(13) the United States, did you know anybody in Corpus
(14) Christi, Texas?
(15) **A. No, I had - no. I had relatives who -**
(16) **who talked to me about San Diego.**
(17) Q. All right. What relatives talked to you
(18) about San Diego?
(19) **A. Well, acquaintances.**
(20) Q. Who were the acquaintances?
(21) **A. Friends from over there and in Odessa.**
(22) Q. What were their names?
(23) **A. Well, there were several of them.**
(24) Q. What were their names?
(25) **A. Maricela.**

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(1) Q. Can you remember anyone else?
(2) **A. And friends of my dad's.**
(3) Q. What were their names?
(4) **A. Well, I don't know their names very well.**
(5) Q. What did Maricela tell you about
(6) San Diego, Texas?
(7) **A. Well, that it was a small, peaceful town**
(8) **where they speak Spanish.**
(9) Q. Where did Maricela live?
(10) **A. She lives in Odessa.**

(11) Q. What's her full name?
(12) **A. Maricela Saenz.**
(13) Q. How do you know Maricela Saenz?
(14) **A. She was a friend of my mother-in-law,**
(15) **Mario's mom.**
(16) Q. Who is Mario's mother-in-law?
(17) **A. My mother.**
(18) Q. All right. Where does - when did - how
(19) long have you known Maricela Saenz?
(20) **A. Around three years.**
(21) Q. Why did you pick San Diego, Texas, over all
(22) of the other places in the state?
(23) **A. Because of what she had said, that it's a**
(24) **peaceful place, and they speak Spanish there.**
(25) Q. Did Ms. Saenz say she knew anybody in

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(1) San Diego, Texas?
(2) **A. Yes, she said she had family or a friend**
(3) **here.**
(4) Q. Okay. Have you talked to that friend?
(5) **A. No.**
(6) Q. Do you know the friend's name?
(7) **A. No.**
(8) Q. Before moving to San Diego, Texas, did
(9) anybody else tell you anything about San Diego,
(10) Texas, other than Maricela Saenz?
(11) **A. No.**
(12) Q. And you cannot remember the name of anybody
(13) else who told you anything about San Diego, Texas?
(14) **A. No.**
(15) Q. When did you enter the United States for
(16) the purpose of moving to San Diego, Texas?
(17) **A. In September.**
(18) Q. Of 1994?
(19) **A. Yes.**
(20) MR. ALEXANDER: In September or
(21) August?
(22) It was in the end of August, first
(23) part of September.
(24) Q. (By Mr. Cauley) Before the first of
(25) September of 1994, did anyone other than Maricela

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(1) Saenz suggest that you move to San Diego, Texas?
(2) MR. ALEXANDER: Well let me object
(3) to the question to the extent that it

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